

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

**JUN 09 2022**

UNITED STATES OF AMERICA

v.

SUPPRESSED

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15 CR 218

Magistrate Judge Cox

MAGISTRATE JUDGE SUSAN E. COX  
UNITED STATES DISTRICT COURT

**MOTION TO UNSEAL ARREST WARRANT,  
CRIMINAL COMPLAINT AND SUPPORTING AFFIDAVIT**

Now comes the UNITED STATES OF AMERICA by JOHN R. LAUSCH, JR.,  
United States Attorney for the Northern District of Illinois, and states as follows in support of its  
Motion to Unseal the Arrest Warrant, Criminal Complaint and Supporting Affidavit in the instant  
matter:

On April 17, 2015, United States Magistrate Judge COX issued an Order sealing  
the arrest warrant, complaint and supporting affidavit in the instant matter. Defendant was  
subsequently located and arrested by the El Paso, Texas Police Department on September 22, 2018.  
As knowledge of the facts in the affidavit supporting the complaint will no longer jeopardize the  
integrity of the ongoing federal fugitive investigation, the Government respectfully requests that  
the arrest warrant, criminal complaint and supporting affidavit be unsealed.

9-1-2

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

By: /s/ Todd E. Carroll

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TODD E. CARROLL  
Special Assistant United States Attorney  
312-829-7498

Date: June 9, 2022